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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE LARRY ALAN BURNS)

UNITED STATES OF AMERICA,)	CASE NO.: 08cr1197-LAB
)	
Plaintiff,)	
)	DATE: MAY 27, 2008
v.)	TIME: 2:00 P.M.
)	
MOHAMED MILOUDI,)	
)	<u>MOTION TO SHORTEN TIME</u>
Defendant.)	
_____)	

The above-named defendant, by and through counsel, moves this Court for an order shortening time for filing Mr. Miloudi's NOTICE OF MOTIONS AND MOTIONS:

- (1) Dismiss Count Two as Multiplicitous;
 - (2) Dismiss Count Two For Lack of Jurisdiction Because 18 U.S.C. § 1028A Does Not Apply to Foreign Nationals;
 - (3) Dismiss the Indictment due to improper Grand Jury instructions;
 - (4) Compel Production Grand Jury Transcripts; And,
 - (5) Dismiss the Indictment for Violation of Mr. Miloudi's Due Process Rights
- to five (5) days, to be heard May 27, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, for the following reasons:

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1 Counsel is received pertinent additional discovery from the government after the May
2 2, 2008, filing deadline for motions. Additionally, counsel was set for two jury trials
3 in the interim, one before the Hon. Janis L. Sammartino on May 19, 2008, in United
4 States v. Gaudencio Cayetano-Camacho, 07cr3267-JLS and one before the Hon. John
5 A. Houston on May 13, 2008, in United States v. Jose Raymundo
6 Contreras-Hernandez, 07cr3190-JAH.

7 Respectfully submitted,

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DATED: May 21, 2008

s/ Candis Mitchell

CANDIS MITCHELL

Federal Defenders of San Diego, Inc.
Attorneys for Mr. Mohamed Miloudi